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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of)
Electronic Filing of Documents) GC Docket No. 97-113
in Rulemaking Proceedings)

COMMENTS OF AMERITECH

I. Introduction

Ameritech respectfully files these comments in the above-captioned matter¹, fully supporting the efforts of the Federal Communications Commission ("Commission") to modernize and improve the efficiency of its filing procedures. The procedures proposed in the NPRM should generally be adopted in all the areas proposed by the Commission² in the most timely possible manner, unless specific technical or resource-related reasons mandate some form of phased-in introduction. In addition, wherever possible, the electronic filing procedures proposed by the Tariff Division should be adapted for application to other specific needs.

¹ In the Matter of Electronic Filing of Documents in Rulemaking Proceedings, GC Docket No. 97-113, Notice of Proposed Rule Making, rel. April 7, 1997 (hereinafter "NPRM").

² These areas included Petitions for Rulemaking, Notices of Inquiry, Petitions for Reconsideration, and notice and comment proceedings other than broadcast allotment proceedings. NPRM, para. 8.

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II. Specific Proposals

As to the logistical details of the procedures to be employed, the filing of a single electronic “copy” of a pleading (with later internal distribution handled by the Commission) should be adopted as proposed³ with the possible exception of any materials designated as proprietary or subject to nondisclosure agreements, for which separate paper distribution routines may prove necessary. The filing of comments on a World Wide Web page is a clearly feasible and attractive option, since this means would allow parties to use a common, convenient, widely-available method to search for and download these materials as they file their own comments. To insure the integrity of the Commission’s files and databases, the alternative of uploading such pleadings directly into a database is not advisable at this time.

As to the authentication and security of electronic filings, the use of encryption measures⁴ does not appear necessary due to the public nature of most such materials (subject to the above-mentioned cautions regarding proprietary information). However, the development and use of special identification measures to deal with the potential problem of frivolous (i.e., forged) filings could lead to administrative difficulties that outweigh any potential benefits which might result. Various effective “digital signature” and account code tracking routines exist today in the form of commercially-available software, and should be implemented as a means to permit ready verification of a pleading’s source without the associated administrative problems that the development and use of special security measures would entail.

³ NPRM, para. 12.

⁴ NPRM, para. 16.

There is a clear need for an electronic equivalent of the clerk's "time stamp" to ensure and verify the timely filing of materials with the Commission, and the return of an automatic acknowledgment by the clerk's office to the sending party appears to serve this need.⁵ In order to eliminate disputes regarding the actual time at which a document was filed, this acknowledgement must reflect the time at which the pleading in question was actually transmitted by the sending party (i.e., the time at which the file transfer was actually completed). Including in such acknowledgment both the "time of transmission" as sent by the filing party with the pleading itself and the "time of receipt" when the Commission actually logs the document into its systems would appear to deal with this problem. In addition, Ameritech agrees with the Commission's conclusion that any required service copies should be sent to the parties in paper form at the present time.⁶

Regarding the specifics of the electronic filing procedures,⁷ the Commission should adopt Adobe's Portable Document Format ("PDF") as the industry standard. The use of PDF for transmitted files would standardize the system of citations, footnotes and page breaks employed by the filing parties, ensuring compatibility among the parties as well as easy document handling within the Commission via commonly-available software and hardware functionality.

⁵ NPRM, para. 18.

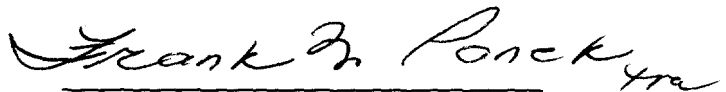
⁶ NPRM, para. 20.

⁷ NPRM, para. 22.

III. Conclusion

For the above-mentioned reasons, the Commission should adopt electronic filing procedures as soon as practical, in the manner described herein.

Respectfully submitted,

A handwritten signature in cursive script, reading "Frank M. Panek". The signature is written in dark ink and is positioned above a horizontal line.

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